UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED UNDER SEAL

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 13-10200-GAO
	)	
DZHOKHAR TSARNAEV	)	

SUPPLEMENTAL MEMORANDUM IN OPPOSITION TO GOVERNMENT'S MOTION IN LIMINE TO PRECLUDE ANY REFERENCE TO WALTHAM TRIPLE HOMICIDE OR OTHER ALLEGED BAD ACTS OF TAMLERAN TSARNAEV

Defendant, Dzhokhar Tsarnaev, by and through counsel, respectfully submits this supplemental memorandum in opposition to the government's Motion in Limine to Preclude Any Reference to Waltham Triple Homicide or Other Alleged Bad Acts of Tamerlan Tsarnaev. [DE 867 (filed under seal).]

At the motion hearing on April 13, 2014, the Court inquired whether there was any activity on Tamerlan Tsarnaev's laptop computer associated with the Waltham murders that took place on September 11, 2011. Counsel was unaware of any, and on further reflection realized that there could not be any such evidence because Tamerlan's Samsung laptop (1W3), was not intially configured until months later, on December 21, 2011. *See* Trial Exhibit 3308. It is not known what if any computer Tamerlan Tsarnaev principally used in September 2011.

However, review of the internet search history on Katherine Tsarnaeva's MacBook Pro computer reveals the following activity approximately one week after the murders:

Date (UTC)	Search Term
9/18/11 14:04	3 men killed in waltham
9/19/11 05:15	men killed in waltham
9/19/11 05:18	tamerlan tsarnaev

See Ex. A (excerpt of search history, attached).

This activity provides additional circumstantial evidence of a connection between Tamerlan Tsarnaev and the Waltham homicides, whether the searches were conducted by Katherine Tsarnaeva or Tamerlan Tsarnaev himself.

Respectfully submitted,

DZHOKHAR TSARNAEV
by his attorneys

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Certificate of Service

I hereby certify that I have caused this document to be served upon counsel for the United States by email PDF on April 14, 2015.

Exhibit A

Search Term	Date Visited (UTC)	URL	Page Title
tory burch outlet	09/19/2011 18:21:49	http://www.google.com/search?client=safari&rls=en&q=tory+burch+ +outlet&ie=UTF-8&oe=UTF-8	tory burch outlet - Google Search
tory burch	09/19/2011 18:17:02	http://www.google.com/search?client=safari&rls=en&q=tory+burch&ie=UTF-8&oe=UTF-8	tory burch - Google Search
tory burch outlet	09/19/2011 18:15:20	http://www.google.com/search?client=safari&rls=en&q=tory+burch+outlet&ie=UTF-8&oe=UTF-8	N/A
classic european made toddler shoes	09/19/2011 18:09:04	http://www.google.com/search?client=safari&rls=en&q=classic+european+made+toddler+shoes&ie=UTF-8&oe=UTF-8	classic european made toddler shoes - Google Search
european made toddler shoes	09/19/2011 18:07:22	http://www.google.com/search?client=safari&rls=en&q=european+made+toddler+shoes&ie=UTF-8&oe=UTF-8	european made toddler shoes - Google Search
when does season 6 of 30 rock start	09/19/2011 17:23:19	http://www.google.com/search?client=safari&rls=en&q=when+does+season+6+of+30+rock+start&ie=UTF-8&oe=UTF-8	when does season 6 of 30 rock start - Google Search
tamerlan tsarnaev	09/19/2011 05:18:23	http://www.google.com/search?client=safari&rls=en&q=tamerlan+tsarnaev&ie=UTF-8&oe=UTF-8	tamerlan tsarnaev - Google Search
men killed in walthan	09/19/2011 05:15:51	http://www.google.com/search?client=safari&rls=en&q=men+killed+in+walthan&ie=UTF-8&oe=UTF-8	N/A
burning palms	09/19/2011 05:08:35	http://www.google.com/search?client=safari&rls=en&q=burning+palms&ie=UTF-8&oe=UTF-8	burning palms - Google Search
islamic nasheed	09/18/2011 22:17:04	http://www.youtube.com/results?search_query=islamic+nasheed&aq=0	islamic nasheed - YouTube
3 men killed in waltham	09/18/2011 14:04:45	http://www.google.com/search?client=safari&rls=en&q=3+men+killed+in+waltham&ie=UTF-8&oe=UTF-8	3 men killed in waltham - Google Search
boston news	09/18/2011 13:55:08	http://www.google.com/search?client=safari&rls=en&q=boston+news&ie=UTF-8&oe=UTF-8	boston news - Google Search
coterie	09/18/2011 13:47:07	http://www.google.com/search?client=safari&rls=en&q=coterie&ie=UTF-8&oe=UTF-8	coterie boston - Google Search
2	09/18/2011 04:36:34	http://www.6pm.com/women-boots/CK_XARCz1wE6AtATqgEBA8ABAeICBRgBAgcV.zso?p=2	Search 6pm.com
1	09/18/2011 04:35:49	http://www.6pm.com/women-boots/CK_XARCz1wE6AtATqgEBA8ABAeICBRgBAgcV.zso?p=1	N/A
beverly hills	09/18/2011 03:56:25	http://www.sidereel.com/_television/search?q=beverly+hills	search results for 'beverly hills' | SideReel
cracker barrel	09/18/2011 03:11:15	http://www.google.com/search?client=safari&rls=en&q=cracker+barrel&ie=UTF-8&oe=UTF-8	cracker barrel - Google Search